

**COZEN O'CONNOR**

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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

LISA BARBOUNIS	:	
	Plaintiff,	CIVIL ACTION
-vs-	:	NO. 2:19-cv-05030-JDW.
	:	
THE MIDDLE EAST FORUM and	:	
GREG ROMAN ( <i>individually</i> ),	:	
	Defendants.	TRIAL BY JURY
	:	
	:	<b>DEFENDANT MATTHEW</b>
	:	<b>BENNETT'S MOTION TO</b>
	:	<b>DISMISS COMPLAINT</b>
	:	

For the reasons set forth in the accompanying memorandum of law, Defendant Matthew Bennett (“Bennett”) moves, pursuant to Federal Rule of Civil Procedure 12(b)(6) to dismiss the claims asserted against him in the Amended Complaint filed by Plaintiff Lisa Barbounis (“Barbounis”). In short, the Complaint is drafted in a careless and haphazard manner, and though Barbounis names Bennett as a defendant, she once again asserts no specific claims against him nor does she plead any facts as to Bennett that would support the claims against him. In this respect, Plaintiff’s complaint again falls woefully short of the pleading standard required by the Federal Rules of Civil Procedure to maintain an action against Bennett. For the reasons

that follow in the accompanying Memorandum, Bennett's Motion should be granted, and the Complaint against him dismissed with prejudice.

Respectfully submitted,

Dated: September 16, 2020

COZEN O'CONNOR

s/David J. Walton

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**CERTIFICATE OF SERVICE**

I hereby certify that I served upon Seth Carson, Esq. a true and correct copy of the within Motion to Dismiss and the accompanying Memorandum of Law via ECF filing.

/s/ David J. Walton  
David J. Walton, Esquire

**COZEN O'CONNOR**

*Attorney for Defendant  
Matthew Bennett*

Dated: September 16, 2020